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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**MEMORY INTEGRITY, LLC,**

Plaintiff,

v.

**INTEL CORPORATION,**

Defendant.

**Case No. 3:15-cv-00262-SI**

**INTEL CORPORATION'S  
UNOPPOSED MOTION FOR  
ADDITIONAL PAGES FOR CLAIM  
CONSTRUCTION BRIEFING**

**Expedited Consideration Requested**

### **CERTIFICATE OF COMPLIANCE WITH LR 7-1**

Pursuant to LR 7-1, counsel for Intel Corporation (“Intel”) certify that they have conferred with Memory Integrity LLC’s (“MI”) counsel, and MI does not oppose this motion. MI also agrees that expedited consideration of this motion is appropriate.

### **MOTION**

Pursuant to LR 7-2(b)(1), Intel moves this Court for an order allowing the parties to each file 75-page Opening Claim Construction Briefs (due September 30, 2015) and 75-page Answering Claim Construction Briefs (due October 28, 2015) (“Claim Construction Briefing”) (Dkt 88).

### **MEMORANDUM**

This case involves 5 patents, 118 claims, and 24 proposed claim terms for construction. Given the complexity of the technology at issue, the number of asserted claims, and the resulting number of claim terms potentially in dispute, the parties would not be able to make complete arguments for the disputed claim constructions within the 35 pages allowed by LR 7-2(b)(1). The parties agree that allowing 75 pages, respectively, for the opening and responsive Claim Construction Briefing will enable the parties to make a full and clear record for the Court and will help to ensure efficient claim construction proceedings. The parties seek expedited consideration of this motion so that the parties have sufficient time to prepare their Opening Claim Construction Briefs within the page limits allowed by the Court by September 30, 2015.

### **CONCLUSION**

In light of the complexity of the Claim Construction Briefing required for this case and the benefits additional briefing will provide to the Court and the parties, Intel respectfully

requests that the Court enter an order on an expedited basis allowing Opening and Answering Claim Construction Briefs up to 75 pages.

DATED this 19th day of August, 2015.

MARKOWITZ HERBOLD PC

By: */s/ Renée E. Rothauge*

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